

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re:

**TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

DEBORAH GRAZIOSO as Personal
Representative of the **ESTATE of
TIMOTHY GRAZIOSO, DECEASED**

DEBORAH GRAZIOSO, surviving
Spouse of Timothy Grazioso

LAUREN GRAZIOSO, surviving Child
of Timothy Grazioso

BRIANA GRAZIOSO, surviving Child
of Timothy Grazioso

CIVIL ACTION: **1:03-md-01570 (GBD)(SN)**
1:22-cv-01188 (GBD)(SN)

CAROLEE AZZARELLO, as Personal
Representative of the **ESTATE of
SANDRA GRAZIOSO, DECEASED**,
surviving Parent of Timothy Grazioso

HANK GRAZIOSO, surviving Parent of
Timothy Grazioso

CAROLEE AZZARELLO, surviving
Sibling of Timothy Grazioso

KAREN VENTRE, surviving Sibling of
Timothy Grazioso

KRISTY GRAZIOSO, surviving Sibling
of Timothy Grazioso

ARLINE PEABODY, surviving Step-
Parent of Michael Bane

BRIAN MAJOR, surviving Step-Sibling
of Michael Bane

BRENDA JOBE, surviving Step-Sibling
of Michael Bane

JOSEPH CARPENETO as Personal
Representative of the **ESTATE of**
JOYCE ANN CARPENETO,
DECEASED

JOSEPH CARPENETO, surviving
Sibling of Joyce Ann Carpeneto

DIAN DEMBINSKI, surviving Sister of
Sandra Wright Cartledge

DIAN DEMBINSKI, as
Personal Representative of the **ESTATE**
of SANDRA WRIGHT CARTLEDGE,
DECEASED

LORETTA HAINES, surviving Sister of
Sandra Wright Cartledge

STEPHEN BRADISH, surviving Sibling
of Sandra Wright Cartledge

GERALDINE DEBORAH SPAETER,
surviving Sibling of Sandra Wright
Cartledge

LYNNE DUNN as Personal
Representative of the **ESTATE of JACK**
BRADISH a/k/a JOHN BRADISH,
DECEASED, surviving Sibling of Sandra
Wright Cartledge

NICHOLAS CHIRCHIRILLO,
surviving Child of Peter Chirchirillo

MICHAEL CHIRCHIRILLO, surviving
Child of Peter Chirchirillo

JOANANN COALE, surviving Parent of
Jeffrey Coale

DANIEL D. COFFEY, M.D. as Personal Representative of the **ESTATE of JEANNETTE COFFEY, DECEASED**, surviving Parent of Daniel M. Coffey

DANIEL D. COFFEY, M.D. as Personal Representative of the **ESTATE of DANIEL F. COFFEY, JR., DECEASED**, a surviving Parent of Daniel M. Coffey

COLLEEN MCDONALD, surviving Fiancée of Jason Coffey

KEITH BRADKOWSKI, surviving Domestic Partner (Functional Equivalent of a Spouse) of Jeffrey Collman

KATHRYN COLLMAN, surviving Step-Mother of Jeffrey Collman

KEITH BRADKOWSKI as Personal Representative of the **ESTATE of BEVERLY SUTTON, DECEASED**, a surviving Parent of Jeffrey Collman

CAROLYN SUTTON, surviving Sibling of Jeffrey Collman

VICKI LYNN MICHEL, surviving Sibling of Jeffrey Collman

STEVE GENGLER, surviving Step-Sibling (Functional Equivalent of a Sibling) of Jeffrey Collman

CHARLES EDWARD GENGLER, surviving Step-Sibling (Functional Equivalent of a Sibling) of Jeffrey Collman

SUSAN BOHAN, surviving Step-Sibling (Functional Equivalent of a Sibling) of Jeffrey Collman

JASON DIEHL, surviving Child of
Michael Diehl

HARLEY DINARDO, a surviving
Sibling of Marisa DiNardo-Schorpp

HARLEY DINARDO, as Personal
Representative of the **ESTATE of**
ESTERINA DINARDO, DECEASED, a
surviving Parent of Marisa DiNardo-
Schorpp

PIO DINARDO, a surviving Parent of
Marisa DiNardo-Schorpp

ANDREW ECONOMOS, a surviving
Sibling of Constantine Economos

ANDREW ECONOMOS and **OLGA**
VALINOTTI as co-Personal
Representatives of the **ESTATE of**
LEON ECONOMOS, DECEASED, a
surviving Parent of Constantine
Economos

OLGA VALINOTTI, a surviving Sibling
of Constantine Economos

EMMA FERNANDEZ REGAN,
surviving Sibling of Judy Fernandez

CIRILO FERNANDEZ, surviving
Parent of Judy Fernandez

RICHARD FERNANDEZ, surviving
Sibling of Judy Fernandez

CONSTANCE FINNICUM, a surviving
Sibling of Richard Gabrielle

GEORGE “GABE” GABRIELLE, a
surviving Sibling of Richard Gabrielle

RENEÉ L. GAMBOA, surviving Parent
of Ronald Gamboa

RENEÉ L. GAMBOA as Personal
Representative of the **ESTATE of**
RANULF GAMBOA, DECEASED,
surviving Parent of Ronald Gamboa

MARIA JOULE, surviving Sister of
Ronald Gamboa

RACHEL G. MALUBAY, surviving
Sister of Ronald Gamboa

JANE G. HALLER, surviving Sibling of
William Godshalk

JOHN G. HALLER, as Personal
Representative of the **ESTATE of**
JAMES BOND GOLDSHALK,
DECEASED, surviving Parent of William
Godshalk

KATHRYN GRAZIOSO, surviving
Child of John Grazioso

KRISTEN GRAZIOSO, surviving Child
of John Grazioso

MICHAEL GRAZIOSO, surviving child
of John Grazioso

CAROLEE AZZARELLO, surviving
Sibling of John Grazioso

CAROLEE AZZARELLO, as Personal
Representative of the **ESTATE of**
SANDRA GRAZIOSO, DECEASED,
surviving Parent of John Grazioso

HANK GRAZIOSO, surviving Parent of
John Grazioso

KAREN VENTRE, surviving Sibling of
John Grazioso

KRISTY GRAZIOSO, surviving Sibling
of John Grazioso

DOUGLAS HALVORSON, surviving
Child of James Halvorson

KATE HALVORSON as Personal
Representative of the **ESTATE of**
EVELYN HALVORSON, DECEASED,
surviving Parent of James Halvorson

KATE HALVORSON, surviving
Sibling of James Halvorson

SEAN BITTERMAN, surviving Step-
Child of Donald Havlish (Functional
Equivalent of a Child)

LEA BITTERMAN, surviving Step-
Child of Donald Havlish (Functional
Equivalent of a Child)

DERRICK HOBIN, surviving Child of
James Jeffery Hobin

JU-HSIU JIAN, a/k/a CONNIE JIAN as
the Personal Representative of the
ESTATE of HWEIDAR JIAN,
DECEASED

JU-HSIU JIAN, a/k/a CONNIE JIAN,
surviving Spouse of Hweidar Jian

WILLIAM JIAN, surviving Child of
Hweidar Jian

KEVIN JIAN, surviving Child of
Hweidar Jian

ANITA KORSONSKY, surviving
Sibling of Jeanette LaFond-Menechino

DINA LAFOND, surviving Parent of
Jeanette LaFond-Menechino

PATRICIA CALOIA, surviving Sibling
of Denis Lavelle

PAUL LAVELLE, surviving Sibling of
Denis Lavelle

MICHAEL A. LOGUIDICE, SR., as
Personal Representative of the **ESTATE**
of CARMELLO JOSEPH
LOGUIDICE, DECEASED, surviving
Parent of Catherine Lisa LoGuidice

JOSEPH LOSTRANGIO, JR.,
surviving Child of Joseph Lostrangio

CATHRYN LOSTRANGIO, surviving
Child of Joseph Lostrangio

DIANE LOSTRANGIO, as Personal
Representative of the **ESTATE of**
JAMES LOSTRANGIO, surviving
Parent of Joseph Lostrangio

ERICH MAERZ, surviving Sibling of
Noell Maerz

RAMON MELENDEZ, JR., surviving
Child of Mary Melendez

RICKY MELENDEZ, surviving Child
of Mary Melendez

JESSE MELENDEZ, surviving Child of
Mary Melendez

TYLER MELENDEZ, surviving Child
of Mary Melendez

FLORENCE ROSARIO, surviving
Sibling of Mary Melendez

MARGARET MONTANEZ, surviving
Sibling of Mary Melendez

PETER C. MILANO, surviving Child of
Peter T. Milano

JESSICA MILANO, surviving Child of
Peter T. Milano

JASON RUBEN MORENO, surviving
Sibling of Yvette Moreno

LEIANA MORENO, surviving Sibling
of Yvette Moreno

NOELIA MORENO, surviving Sibling
of Yvette Moreno

KATHERINE TYNION, surviving
Sibling of Robert M. Murach

MARY ELLEN MURACH, surviving
Parent of Robert M. Murach

MARY ELLEN MURACH, as Personal
Representative of the **ESTATE of**
EDWARD JOHN MURACH,
DECEASED, surviving Parent of Robert
M. Murach

RICHARD J. MURACH, surviving
Sibling of Robert M. Murach

NEAL GREEN, surviving Sibling of
Brian Nunez

JOEL R. PERRY (Appointment
Pending) as Personal Representative of the
ESTATE of JAMES LESLIE PERRY,
DECEASED, surviving Parent of John
Perry

ROOSEVELT STALLWORTH,
surviving Sibling of Marsha Ratchford

CARL STALLWORTH, surviving
Sibling of Marsha Ratchford

ANGELIA STALLWORTH-BLUNT,
surviving Sibling of Marsha Ratchford

BRIAN CHRISTIAN, surviving Sibling
of Marsha Ratchford

AMANDA ROGERS, surviving Sibling
of Marsha Ratchford

DIANA DIAZ as Personal Representative
of the **ESTATE of CARMEN
ROMERO, DECEASED**, surviving
Parent of Elvin Romero

DIANA DIAZ as Personal Representative
of the **ESTATE of ISAAC ROMERO,
DECEASED**, surviving Parent of Elvin
Romero

DIANA DIAZ, surviving Sibling of Elvin
Romero

LOREN ROSENTHAL as Personal
Representative of the **ESTATE of EVAN
ROSENTHAL, DECEASED**, surviving
Child of Richard Rosenthal

LOREN ROSENTHAL as Personal
Representative of the **ESTATE of SETH
ROSENTHAL, DECEASED**, surviving
Child of Richard Rosenthal

AUDREY MODEL as Personal
Representative of the **ESTATE of
LEONARD ROSENTHAL,
DECEASED**, surviving Parent of Richard
Rosenthal

AUDREY MODEL as Personal
Representative of the **ESTATE of
FLORENCE ROSENTHAL,
DECEASED**, surviving Parent of Richard
Rosenthal

AUDREY MODEL, surviving Sibling of
Richard Rosenthal

GARY REISS, surviving Parent of
Joshua Reiss

ADAM REISS, surviving Sibling of
Joshua Reiss

JORDAN REISS, surviving Sibling of
Joshua Reiss

JONATHAN REISS, surviving Sibling
of Joshua Reiss

JENNIFER REISS, surviving Sibling of
Joshua Reiss

ALEXANDER ROWE, surviving Parent
of Nicholas Rowe

VICTOR SANTILLAN, surviving
Sibling of Maria Theresa Santillan

RAYMOND SANTILLAN, surviving
Sibling of Maria Theresa Santillan

LORI BRODY, surviving Sibling of
Scott Schertzer

ELLEN SCHERTZER, surviving Parent
of Scott Schertzer

PATRICIA SLOAN, surviving Parent of
Paul K. Sloan

MATT SLOAN, surviving Sibling of
Paul K. Sloan

SARAH FUNK, surviving Sibling of Paul
K. Sloan

RAYMOND SMITH, Personal
Representative of the **ESTATE of**
MARION THOMAS, DECEASED,
surviving Grandparent of George Smith
(Functional Equivalent of a Parent)

RAYMOND SMITH on behalf of the
ESTATE of DEBORAH SALLAD,
DECEASED, surviving sibling of George
Smith

CARL SMITH, surviving Sibling of
George Smith

KEVIN SMITH, surviving Sibling of
George Smith

KORRY SMITH, surviving Sibling of
George Smith

TANYA WARREN, surviving sibling of
George Smith

LETRICIA SMITH, surviving Sibling of
George Smith

ELAINE SMITH, surviving Sibling of
George Smith

CHRISTINE JACKSON, surviving
Sibling of George Smith

BARBARA HARGROVE, surviving
Sibling of George Smith

RAYMOND SMITH, JR., surviving
Sibling of George Smith

TIMOTHY P. SOULAS, JR., surviving
Child of Timothy Soulas, Sr.

ANDREW J. SOULAS, surviving Child
of Timothy Soulas

CHRISTOPHER SOULAS, surviving
Child of Timothy Soulas

MATTHEW SOULAS, surviving Child
of Timothy Soulas

NICOLE SOULAS, surviving Child of
Timothy Soulas

DANIEL SOULAS, surviving Child of
Timothy Soulas

FREDERICK SOULAS, surviving
Parent of Timothy Soulas

STEPHEN SOULAS, surviving Sibling
of Timothy Soulas

FREDERICK SOULAS, III, surviving
Sibling of Timothy Soulas

DANIEL D. SOULAS, surviving Sibling
of Timothy Soulas

MICHELLE DONLAN, surviving
Sibling of Timothy Soulas

AARON STRAUB, surviving Child of
Edward W. Straub

JONATHAN STRAUB, surviving Child
of Edward W. Straub

MICHAEL STRAUB, surviving Child of
Edward W. Straub

EDWARD STRAUB, surviving Parent of
Edward W. Straub

STANLEY STRAUB, surviving Sibling
of Edward W. Straub

MATTHEW STRAUB, surviving
Sibling of Edward W. Straub

SALVATORE TINO, JR., surviving
Parent of Jennifer Tino

JEFFREY TINO, surviving Sibling of
Jennifer Tino

SALVATORE TINO, III, surviving
Sibling of Jennifer Tino

JOSEPH NICKLO, surviving Sibling of
Jeanmarie Wallendorf

MELLANIE CHAFE, surviving Sibling
of Jeanmarie Wallendorf

CHRISTOPHER BARTON, surviving
Sibling of Jeanmarie Wallendorf

JOHN BARTON, surviving Sibling of
Jeanmarie Wallendorf

ROY-YETKUTIEL SHEFI, surviving
Child of Hagay Shefi

NAOMI-RUTH SHEFI, surviving Child
of Hagay Shefi

**JOY KAUFMAN, a/k/a RINA
KAUFMAN**, surviving Sibling of Leon
Lebor

**JOY KAUFMAN, a/k/a RINA
KAUFMAN** as Personal Representative
of the **ESTATE of BESSIE LEBOR,
DECEASED**, surviving Parent of Leon
Lebor

BARBARA LURMAN as the Personal
Representative of the **ESTATE of LEON
LEBOR, DECEASED**

BARBARA LURMAN, surviving Child
of Leon Lebor

KUI LIONG LEE, as Personal
Representative of the **ESTATE of SIEW
NYA ANG, DECEASED**

MELODIE HOMER as Personal
Representative of the **ESTATE of
LEROY W. HOMER, JR., DECEASED**

MELODIE HOMER, surviving Spouse
of LeRoy W. Homer, Jr.

LAUREL HOMER, surviving Child of
LeRoy W. Homer, Jr.

CANDY MOYER, as Personal
Representative of the **ESTATE OF**
JOHN R. JONES, DECEASED,
surviving Parent of Donald W. Jones

AUDREY R. JONES, surviving Parent of
Donald W. Jones

ROBERT A. JONES, surviving Sibling
of Donald W. Jones

CANDY JONES MOYER, surviving
Sibling of Donald W. Jones

AMY MARTINEZ as Personal
Representative of the **ESTATE of LOUIS**
NACKE, DECEASED

AMY MARTINEZ, surviving Spouse of
Louis Nacke

TANYA DAVIS as Personal
Representative of the **ESTATE of**
WAYNE T. DAVIS, DECEASED

TANYA DAVIS, surviving Spouse of
Wayne T. Davis

GABRIELLE HUNTER DAVIS,
surviving Child of Wayne T. Davis

MALACHAI ROARKE DAVIS,
surviving Child of Wayne T. Davis

NOVERTA DAVIS-DEAN, surviving
Parent of Wayne T. Davis

JOHNNY MISTRULLI and **MARIA**
LAMBERT as co-Personal
Representatives of the **ESTATE of**
ANNE MISTRULLI, DECEASED,
surviving Parent of Joseph D. Mistrulli

JOHNNY MISTRULLI, surviving
Sibling of Joseph D. Mistrulli

MARIA LAMBERT, surviving Sibling
of Joseph D. Mistrulli

KAREN LUNDER as Personal
Representative of the **ESTATE OF**
CHRISTOPHER E. LUNDER,
DECEASED

KAREN LUNDER, surviving Spouse of
Christopher E. Lunder

HERMAN RAY, surviving Sibling
of Denease Conley

HERMAN RAY as Personal
Representative of the **ESTATE OF**
DENEASE CONLEY, DECEASED

CHERRIE L. ALLEN, surviving Sibling
of Denease Conley

IRMA JOYCE FLETCHER, surviving
Sibling of Denease Conley

MYRA BYRD, as Personal
Representative of the **ESTATE of EARL**
RAY, DECEASED, surviving Sibling of
Denease Conley

BARBARA HAYNES-JENKINS,
surviving Sibling of Denease Conley

HERMAN RAY, as Personal
Representative of the **ESTATE of**
JAMES RAY, DECEASED, surviving
Sibling of Denease Conley

ODETTA HAYWOOD, as Personal
Representative of the **ESTATE OF**
STANLEY RAY, DECEASED,
surviving Sibling of Denease Conley

AARON ADLER, surviving Sibling of
Lee Alan Adler

ALICE DOERGE ADLER, surviving
Spouse of Lee Alan Adler

ALICE DOERGE ADLER, as Personal
Representative of the **ESTATE OF LEE
ALAN ADLER, DECEASED**

ISABELL DANSIGER ADLER,
surviving Parent of Lee Alan Alder

JAY ADLER, surviving Sibling of Lee
Alan Adler

**LAUREN SARAH ADLER
MARTINELLI**, surviving Child of Lee
Alan Adler

ANITA DEBLASE, surviving Parent of
James V. DeBlase

ANTHONY DEBLASE, surviving
Sibling of James V. DeBlase

RICHARD DEBLASE, surviving Sibling
of James V. DeBlase

MARIANNA GARFI, surviving Parent
of Francesco Garfi

SALVATORE GARFI, surviving Parent
of Francesco Garfi

VITO GARFI, surviving Sibling of
Francesco Garfi

VITO GARFI, as Personal
Representative of the **ESTATE OF
FRANCESCO GARFI, DECEASED**

THERESA COOKE, surviving Sibling
of LeRoy W. Homer, Jr.

MICHELLE HARGIS, surviving Sibling
of LeRoy W. Homer, Jr.

CHRISTINE HOMER, surviving
Sibling of LeRoy W. Homer, Jr.

CHRISTINE HOMER, as Personal
Representative of the **ESTATE OF
THOMAS FREIMARK, DECEASED**,
surviving Sibling of LeRoy W. Homer, Jr.

ILSE HOMER, surviving Parent of
LeRoy W. Homer, Jr.

MONIQUE HOMER, surviving Sibling
of LeRoy W. Homer, Jr.

MARILYN JOHNSON, surviving
Sibling of LeRoy W. Homer, Jr.

CHERYL HOMER WILSON, surviving
Sibling of LeRoy W. Homer, Jr.

GERMAINE WILSON, surviving
Sibling of LeRoy Homer, Jr.

ANDREW BRIAN JORDAN, JR.,
surviving Child of Andrew Brian Jordan,
Sr.

DAVID LEBOR, surviving Sibling of
Leon Lebor

RINA “JOY” KAUFMAN, as Personal
Representative of the **ESTATE OF
PHILIP LEBOR, DECEASED**,
deceased Parent of Leon Lebor

DANIELLE MCGUIRE, as Personal
Representative of the **ESTATE OF
PATRICK MCGUIRE, DECEASED**

DANIELLE MCGUIRE, surviving
Spouse of Patrick McGuire

MARA MCGUIRE, surviving Child of
Patrick McGuire

RYAN MCGUIRE, surviving Child of
Patrick McGuire

SEAN MCGUIRE, surviving Child of
Patrick McGuire

SHEA MCGUIRE, surviving Child of
Patrick McGuire

ANNEMARIE MEDAGLIA, surviving
Parent of Rocco Medaglia

DIANA MEDAGLIA, surviving Child of
Rocco Medaglia

**KATHLEEN MEDAGLIA-
DELLAPENNA**, surviving Sibling of
Rocco Medaglia

MARYELLEN MEDAGLIA, surviving
Sibling of Rocco Medaglia

MICHAEL MEDGALIA, surviving
Sibling of Rocco Medaglia

ELIZABETH MEDAGLIA-CORDES,
surviving Child of Rocco Medaglia

ELIZABETH MEDAGLIA-CORDES
as Personal Representative of the
ESTATE OF ROCCO MEDAGLIA,
DECEASED

JOANNE MISTRULLI as Personal
Representative of the **ESTATE of**
FRANK MISTRULLI, surviving
Sibling of Joseph D. Mistrulli

PAULA NACKE JACOBS, surviving
Sibling of Louis J. Nacke

DALE ALLEN NACKE, surviving
Sibling of Louis J. Nacke

DALE ALLEN NACKE as Personal
Representative of the **ESTATE OF
LOUIS P. NACKE, DECEASED**,
surviving Parent of Louis J. Nacke

DALE ALLEN NACKE Personal
Representative of the **ESTATE OF
PHILOMENA MILLACE NACKE,
DECEASED**, surviving Parent of Louis J.
Nacke

KENNETH NACKE, surviving Sibling
of Louis J. Nacke

LOUIS PAUL NACKE, II, surviving
Child of Louis J. Nacke

JOSEPH NICHOLAS NACKE,
surviving Child of Louis J. Nacke

THOMAS PAPASSO, surviving Sibling
of Salvatore T. Papasso

PATRICIA MASON, surviving Sibling
of Sandra Wright-Cartledge

JAMES CASAZZA, surviving Sibling of
John F. Casazza

DEBRA ZEPLIN, as Personal
Representative of the **ESTATE OF
MARC SCOTT ZEPLIN, DECEASED**

DEBRA ZEPLIN, surviving Spouse of
Marc Scott Zeplin

ETHAN ZEPLIN, surviving Child of
Marc Scott Zeplin

RYAN ZEPLIN, surviving Child of Marc
Scott Zeplin

DANIEL R. MAHER, surviving Child of
Daniel L. Maher

JOSEPH F. MAHER, surviving Child of
Daniel L. Maher

Plaintiffs,

v.

**ISLAMIC EMIRATE OF
AFGHANISTAN a/k/a THE
TALIBAN**,
an unincorporated association

MUHAMMAD OMAR, individually
Last known location: Afghanistan

**SHEIKH USAMAH BIN-
MUHAMMAD
BIN-LADEN, DECEASED
a/k/a OSAMA BIN LADEN,
DECEASED**

and

**AL-QAEDA a/k/a AL-QAEDA
ISLAMIC ARMY**,
an unincorporated association

Defendants.

PLAINTIFFS' SECOND AMENDED COMPLAINT

COME NOW, Plaintiffs and state the following as their Second Amended Complaint:

1. On September 11, 2001, 2,976 individuals, referred to herein as “Decedents,” were murdered when nineteen terrorists caused four airliners to crash into the World Trade Center Towers in New York, the Pentagon Building in Arlington County, Virginia and a field near the town of Shanksville, Pennsylvania. Plaintiffs are the personal representatives and family members of some of the Decedents.

2. The nineteen hijackers (hereinafter collectively referred to as the “al-Qaeda hijackers” or the “hijackers”) were members of a network known as al-Qaeda, a terrorist organization dedicated to the destruction of the United States and its citizens. The al-Qaeda organization was, and is, dedicated to the goal of establishing a universal Islamic state through the use of violence. Immediately prior to the 9/11 attacks, al-Qaeda maintained its headquarters in Afghanistan.

3. The leader of al-Qaeda was Sheikh Usamah bin-Muhammad bin-laden, Deceased, a/k/a Osama bin Laden (hereinafter referred to as “bin Laden”), a former citizen of Saudi Arabia who, prior to his death on May 2, 2011, planned, conspired, funded, directed, controlled, and engaged in terrorist activities and pursuits involving intentional and willful mass murder of thousands of innocent men, women, and children, including the victims of the 9/11 terrorist attacks. On several occasions, bin Laden admitted his and al-Qaeda’s participation in, and responsibility for, the 9/11 attacks.

4. Al-Qaeda trained, funded and supported the hijackers, with the aid and assistance of various individuals, organizations and governments, including Defendants named herein – bin Laden, the Taliban, and Muhammad Omar.

5. For years prior to the 9/11 attacks, bin Laden had declared and advocated “jihad” - holy war - against the United States. For example, on February 23, 1998, bin Laden urged jihad against Americans and published in the newspaper *Al Quds al-Arabi* the following: “*the ruling to kill the Americans and their allies - civilians and military - is an individual duty for every Muslim who can do it in any country in which it is possible to do it.*” On August 20, 1998, President Clinton advised that the United States was taking military action against terrorist objectives in Afghanistan and Sudan: “*Our target was terror; our mission was clear: to strike at the network of radical groups affiliated with and funded by Osama Bin Laden, perhaps the preeminent organizer and financier of international terrorism in the world today.*” On August 21, 1998, the United States Department of State found that: “*Bin Laden’s network leads, funds and inspires a wide range of Islamic extremist groups that perpetrate acts of terrorism around the world.*”

6. In conducting their terrorist activities, bin Laden and al-Qaeda received financial, logistical and other direct material support from foreign states, such as the Islamic Republic of Iran, terrorist organizations, and individuals. The Islamic Emirate of Afghanistan, a/k/a the Taliban, and Muhammad Omar provided bin Laden and al-Qaeda with direct material support that aided the 9/11 terrorist attacks. Plaintiffs now seek to hold all Defendants accountable for their role in facilitating these murders.

JURISDICTION AND VENUE

7. Jurisdiction arises pursuant to 28 U.S.C. 1331 and 1332(a)(2). Jurisdiction also arises under the Torture Victim Protection Act of 1991, PL 102-256, 106 Stat. 73 (reprinted at 28 U.S.C.A. §1350 note (West 1993)), and 18 U.S.C. §2333.

8. Venue is dictated by the jurisdiction conferring provision of § 408(b)(3) of Title IV of the Air Transportation Safety and System Stabilization Act (codified at 49 U.S.C. 40101 note):

“The United States District Court for the Southern District of New York shall have original and exclusive jurisdiction over all actions brought for any claim (including any claim for loss of property, personal injury, or death) resulting from or relating to the terrorist-related aircraft crashes of September 11, 2001.”

9. Venue is also proper in this District because it is the situs of the Multidistrict Litigation captioned *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN).

10. This Complaint also alleges state law claims for wrongful death, personal injury and related torts perpetrated by all Defendants, whether acting on their own accord, or through their officials, employees, proxies, and agents.

11. With one exception (plaintiff James Casazza herein), this Complaint is filed on behalf of those plaintiffs in this MDL who previously received final judgments as to liability and damages under 28 U.S.C. §1605A against the Islamic Republic of Iran (“Iran”) for providing direct and material support to al-Qaeda in carrying out the terrorist attacks of September 11, 2001.

PLAINTIFFS

12. **Deborah Grazioso** is the Personal Representative of the **Estate of Timothy Grazioso**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

13. **Deborah Grazioso** is the surviving Spouse of Timothy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried

out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

14. **Lauren Grazioso** is a surviving Child of Timothy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

15. **Briana Grazioso** is a surviving Child of Timothy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

16. **Carolee Azarello** is the Personal Representative of the **Estate of Sandra Grazioso**, a surviving Parent of Timothy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

17. **Carolee Azzarello** is a surviving Sibling of Timothy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

18. **Karen Ventre** is a surviving Sibling of Timothy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

19. **Kristy Grazioso** is a surviving Sibling of Timothy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

20. **Hank Grazioso** is a surviving Parent of Timothy Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

21. **Arline Peabody** is a surviving Step-Parent of Michael Bane (Functional Equivalent of a Parent), one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

22. **Brian Major** is a surviving Step-Sibling of Michael Bane (Functional Equivalent of a Sibling), one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

23. **Brenda Jobe** is a surviving Step-Sibling of Michael Bane (Functional Equivalent of a Sibling), one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

24. **Joseph Carpeneto** is the Personal Representative of the **Estate of Joyce Ann Carpeneto, Deceased**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

25. **Joseph Carpeneto** is a surviving Sibling of Joyce Ann Carpeneto, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

26. **Dian Dembinski** is the Personal Representative of the **Estate of Sandra Wright Cartledge**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

27. **Dian Dembinski** is a surviving Sibling of Sandra Wright Cartledge, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

28. **Loretta Haines** is a surviving Sibling of Sandra Wright Cartledge, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

29. **Stephen Bradish** is a surviving Sibling of Sandra Wright Cartledge, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

30. **Geraldine Deborah Spaeter** is a surviving Sibling of Sandra Wright Cartledge, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

31. **Lynne Dunn** is the Personal Representative of the **Estate of Jack Bradish a/k/a/ John Bradish**, a surviving Sibling of Sandra Wright Cartledge, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

32. **Nicholas Chirchirillo** is a surviving Child of Peter Chirchirillo, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

33. **Michael Chirchirillo** is a surviving Child of Peter Chirchirillo, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

34. **Joan Ann Coale** is a surviving Parent of Jeffrey Coale, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out al-

Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

35. **Daniel D. Coffey, M.D.** is the Personal Representative of the **Estate of Jeannette Coffey**, a surviving Parent of Daniel M. Coffey, a Decedent murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

36. **Daniel D. Coffey, M.D.** is the Personal Representative of the **Estate of Daniel F. Coffey, Jr.**, a surviving Parent of Daniel M. Coffey, a Decedent murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

37. **Colleen McDonald** is a surviving Fiancée (Functional Equivalent of a Spouse) of Jason Coffey, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

38. **Keith Bradkowski** is a surviving Domestic Partner (Functional Equivalent of a Spouse) of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

39. **Kathryn Collman** is a surviving Step-Mother (Functional Equivalent of a Parent) of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

40. **Keith Bradkowski** is the Personal Representative of the **Estate of Beverly Sutton**, a surviving Parent of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

41. **Carolyn Sutton** is a surviving Sibling of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

42. **Vicki Lynn Michel** is a surviving Sibling of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

43. **Steve Gengler** is a surviving Step-Sibling (Functional Equivalent of a Sibling) of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

44. **Charles Edward Gengler** is a surviving Step-Sibling (Functional Equivalent of a Sibling) of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

45. **Susan Bohan** is a surviving Step-Sibling (Functional Equivalent of a Sibling) of Jeffrey Collman, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

46. **Jason Diehl** is a surviving Child of Michael Diehl, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

47. **Harley DiNardo** is a surviving Sibling of Marisa DiNardo-Schorpp, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

48. **Harley DiNardo** is the Personal Representative of the **Estate of Esterina DiNardo**, a surviving Parent of Marisa DiNardo-Schorpp, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

49. **Pio DiNardo** is a surviving Parent of Marisa DiNardo-Schorpp, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

50. **Andrew Economos** is a surviving Sibling of Constantine Economos, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

51. **Andrew Economos** and **Olga Valinotti** are co-Personal Representatives of the **Estate of Leon Economos**, a surviving Parent of Constantine Economos, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

52. **Olga Valinotti** is a surviving Sibling of Constantine Economos, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

53. **Emma Fernandez Regan** is a surviving Sibling of Judy Fernandez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

54. **Cirilo Fernandez** is a surviving Parent of Judy Fernandez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-

Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

55. **Richard Fernandez** is a surviving Sibling of Judy Fernandez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

56. **Constance Finnicum** is a surviving Sibling of Richard Gabrielle, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

57. **George “Gabe” Gabrielle** is a surviving Sibling of Richard Gabrielle, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

58. **Reneé L. Gamboa** is a surviving Parent of Ronald Gamboa, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

59. **Reneé L. Gamboa** is the Personal Representative of the **Estate of Ranulf Gamboa**, a surviving Parent of Ronald Gamboa, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

60. **Maria Joule** is a surviving Sibling of Ronald Gamboa, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

61. **Rachel G. Malubay** is a surviving Sister of Ronald Gamboa, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

62. **John G. Haller** is the Personal Representative of the **Estate of James Bond Godshalk**, a surviving Parent of William Godshalk, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

63. **Jane G. Haller** is a surviving Sibling of William Godshalk, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

64. **Kathryn Grazioso** is a surviving Child of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

65. **Kristen Grazioso** is a surviving Child of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-

Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

66. **Michael Grazioso** is a surviving Child of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

67. **Carolee Azzarello** is a surviving Sibling of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

68. **Carolee Azarello** is the Personal Representative of the **Estate of Sandra Grazioso**, a surviving Parent of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

69. **Karen Ventre** is a surviving Sibling of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

70. **Kristy Grazioso** is a surviving Sibling of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

71. **Carolee Azzarello** is a surviving Sibling of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

72. **Douglas Halvorson** is a surviving Child of James Halvorson, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

73. **Kate Halvorson** is the Personal Representative of the **Estate of Evelyn Halvorson**, a surviving Parent of James Halvorson, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

74. **Kate Halvorson** is a surviving Sibling of James Halvorson, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

75. **Sean Bitterman** is a surviving Step-Child (Functional Equivalent of a Child) of Donald Havlish, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

76. **Lea Bitterman** is a surviving Step-Child (Functional Equivalent of a Child) of Donald Havlish, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

77. **Derrick Hobin** is a surviving Child of James Jeffery Hobin, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

78. **Ju-Hsiu Jian a/k/a Connie Jian** is the Personal Representative of the **Estate of Hweidar Jian**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

79. **Ju-Hsiu Jian a/k/a Connie Jian** is the surviving Spouse of **Hweidar Jian**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

80. **William Jian** is a surviving Child of Hweidar Jian, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, **of Hweidar Jian**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

81. **Kevin Jian** is a surviving Child of Hweidar Jian, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

82. **Anita Korsonsky** is a surviving Sibling of Jeanette LaFond-Menechino, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

83. **Dina LaFond** is a surviving Parent of Jeanette LaFond-Menechino, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

84. **Patricia Caloia** is a surviving Sibling of Denis Lavelle, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

85. **Paul Lavelle** is a surviving Sibling of Denis Lavelle, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

86. **Michael A. LoGuidice, Sr.** is the Personal Representative of the **Estate of Carmello Joseph LoGuidice**, a surviving Parent of Catherine Lisa LoGuidice, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried

out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

87. **Joseph Lostrangio, Jr.** is a surviving Child of Joseph Lostrangio, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

88. **Cathryn Lostrangio** is a surviving Child of Joseph Lostrangio, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

89. **Diane Lostrangio** is the Personal Representative of the **Estate of James Lostrangio**, a surviving Parent of Joseph Lostrangio, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

90. **Erich Maerz** is a surviving Sibling of Noell Maerz, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

91. **Ramon Melendez, Jr.** is a surviving Child of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

92. **Tyler Melendez** is a surviving Child of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

93. **Ricky Melendez** is a surviving Child of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

94. **Jesse Melendez** is a surviving Child of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

95. **Florence Rosario** is a surviving Sibling of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

96. **Margaret Montanez** is a surviving Sibling of Mary Melendez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

97. **Peter C. Milano** is a surviving Child of Peter T. Milano, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-

Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

98. **Jessica Milano** is a surviving Child of Peter T. Milano, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

99. **Jason Ruben Moreno f/k/a Rolando R. Moreno** is a surviving Sibling of Yvette Moreno, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

100. **Leiana Moreno** is a surviving Sibling of Yvette Moreno, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

101. **Noelia Moreno** is a surviving Sibling of Yvette Moreno, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

102. **Katherine Tynion** is a surviving Sibling of Robert M. Murach, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

103. **Mary Ellen Murach** is a surviving Parent of Robert M. Murach, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

104. **Mary Ellen Murach** is the Personal Representative of the **Estate of Edward John Murach**, a surviving Parent of Robert M. Murach, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

105. **Richard J. Murach** is a surviving Sibling of Robert M. Murach, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

106. **Neal Green** is a surviving Sibling of Brian Nunez, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

107. **Joel Perry** is the Personal Representative (Appointment Pending) of the **Estate of James Leslie Perry**, a surviving Parent of John Perry, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

108. **Roosevelt Stallworth** is a surviving Sibling of Marsha Ratchford, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

109. **Carl Stallworth** is a surviving Sibling of Marsha Ratchford, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

110. **Angelia Stallworth-Blunt** is a surviving Sibling of Marsha Ratchford, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

111. **Brian Christian** is a surviving Sibling of Marsha Ratchford, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

112. **Amanda Rogers** is a surviving Sibling of Marsha Ratchford, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

113. **Diana Diaz** is the Personal Representative of the **Estate of Carmen Romero**, a surviving Parent of Elvin Romero, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden,

Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

114. **Diana Diaz** is the Personal Representative of the **Estate of Isaac Romero**, is a surviving Parent of Elvin Romero, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban provided material support and assistance in furtherance of the attacks.

115. **Diana Diaz** is a surviving Sibling of Elvin Romero, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

116. **Loren Rosenthal** is the Personal Representative of the **Estate of Evan Rosenthal**, a surviving Child of Richard Rosenthal, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

117. **Loren Rosenthal** is the Personal Representative of the **Estate of Seth Rosenthal**, a surviving Child of Richard Rosenthal, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

118. **Audrey Model** is the Personal Representative of the **Estate of Leonard Rosenthal**, a surviving Parent of Richard Rosenthal, one of the Decedents murdered as a result

of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

119. **Audrey Model** is the Personal Representative of the **Estate of Florence Rosenthal**, a surviving Parent of Richard Rosenthal, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

120. **Audrey Model** is a surviving Sibling of Richard Rosenthal, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

121. **Gary Reiss** is a surviving Parent of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

122. **Adam Reiss** is a surviving Sibling of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

123. **Jordan Reiss** is a surviving Sibling of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-

Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

124. **Jonathan Reiss** is a surviving Sibling of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

125. **Jennifer Reiss** is a surviving Sibling of Joshua Reiss, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

126. **Alexander Rowe** is the surviving Parent of Nicholas Rowe, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

127. **Victor Santillan** is a surviving Sibling of Maria Theresa Santillan, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

128. **Raymond Santillan** is a surviving Sibling of Maria Theresa Santillan, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

129. **Lori Brody** is a surviving Sibling of Scott Schertzer, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

130. **Ellen Schertzer** is a surviving Parent of Scott Schertzer, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

131. **Patricia Sloan** is a surviving Parent of Paul K. Sloan, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

132. **Matt Sloan** is a surviving Sibling of Paul K. Sloan, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

133. **Sarah Funk** is a surviving Sibling of Paul K. Sloan, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

134. **Raymond Smith** is the Personal Representative of the **Estate of Marion Thomas**, a surviving Grandmother (Functional Equivalent of a Parent) of George Smith, one of

the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

135. **Raymond Smith** is the Personal Representative of the **Estate of Deborah Sallad**, a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

136. **Carl Smith** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

137. **Kevin Smith** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

138. **Korry Smith** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

139. **Tanya Warren** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-

Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

140. **Letricia Smith** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

141. **Elaine Smith** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

142. **Christine Jackson** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

143. **Barbara Hargrove** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

144. **Raymond Smith, Jr.** is a surviving Sibling of George Smith, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

145. **Timothy P. Soulas, Jr.** is a surviving Child of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

146. **Andrew J. Soulas** is a surviving Child of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

147. **Christopher Soulas** is a surviving Child of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

148. **Matthew Soulas** is a surviving child of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

149. **Nicole Soulas** is a surviving child of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

150. **Daniel Soulas** is surviving child of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-

Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

151. **Frederick Soulas** is a surviving Parent of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

152. **Stephen Soulas** is a surviving Sibling of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by Defendants al-Qaeda and Osama bin Laden, Deceased, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

153. **Frederick Soulas, III** is a surviving Sibling of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

154. **Daniel D. Soulas** is a surviving Sibling of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

155. **Michelle Donlan** is a surviving Sibling of Timothy Soulas, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

156. **Aaron Straub** is a surviving Child of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

157. **Jonathan Straub**, a minor surviving child of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

158. **Michael Straub** is a surviving Child of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

159. **Samuel Straub** is a surviving Child of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

160. **Edward Straub** is a surviving Parent of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

161. **Stanley Straub** is a surviving Sibling of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-

Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

162. **Matthew Straub** is a surviving Sibling of Edward W. Straub, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

163. **Salvatore Tino, Jr.** is a surviving Parent of Jennifer Tino, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

164. **Jeffrey Tino** is a surviving Sibling of Jennifer Tino, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

165. **Salvatore Tino, III** is a surviving Sibling of Jennifer Tino, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

166. **Joseph Nicklo** is a surviving Sibling of Jeanmarie Wallendorf, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

167. **Mellanie Chafe** is a surviving Sibling of Jeanmarie Wallendorf, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

168. **Christopher Barton** is a surviving Sibling of Jeanmarie Wallendorf, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

169. **John Barton** is a surviving Sibling of Jeanmarie Wallendorf, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

170. **Roy-Yetkutiel Shefi** is a surviving son of Hagay Shefi, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

171. **Naomi-Ruth Shefi** is a surviving Child of Hagay Shefi, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

172. **Joy Kaufman a/k/a Rina Kaufman**, is a surviving Sibling of Leon Lebor, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were

carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

173. **Joy Kaufman a/k/a Rina Kaufman** is the Personal Representative of the **Estate Bessie Lebor**, a surviving Parent of Leon Lebor, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

174. **Barbara Lurman** is the Personal Representative of the **Estate of Leon Lebor**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

175. **Barbara Lurman** is a surviving Child of Leon Lebor, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

176. **Melodie Homer** is the Personal Representative of the **Estate of LeRoy W. Homer, Jr.**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

177. **Melodie Homer** is the surviving Spouse of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried

out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

178. **Laurel Homer** is a surviving Child of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

179. **Candy Moyer** is the Personal Representative of the **Estate of John R. Jones**, a surviving Parent of Donald W. Jones, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

180. **Audrey R. Jones** is a surviving Parent of Donald W. Jones, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

181. **Robert A. Jones** is a surviving Sibling of Donald W. Jones, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

182. **Candy Jones Moyer** is a surviving Sibling of Donald W. Jones, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

183. **Amy Martinez** is the Personal Representative of the **Estate of Louis Nacke**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

184. **Amy Martinez** is the surviving Spouse of Louis Nacke, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

185. **Tanya Davis** is the Personal Representative of the **Estate of Wayne T. Davis**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

186. **Tanya Davis** is the surviving spouse of Wayne T. Davis, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

187. **Gabrielle Hunter Davis** is a surviving Child of Wayne T. Davis, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

188. **Malachai Roarke Davis** is a surviving Child of Wayne T. Davis, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried

out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

189. **Noverta Davis-Dean** is the Parent of Wayne T. Davis, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

190. **Johnny Mistrulli** and **Maria Lambert** are co-Personal Representatives of the **Estate of Anne Mistrulli**, a surviving Parent of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

191. **Johnny Mistrulli** is the surviving Sibling of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

192. **Maria Lambert** is the surviving Sibling of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

193. **Karen Lunder** is the Personal Representative of the **Estate of Christopher E. Lunder**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the

Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

194. **Karen Lunder** is the surviving spouse of Christopher E. Lunder, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

195. **Herman Ray** is a surviving Sibling of Denease Conley, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

196. **Herman Ray** is the Personal Representative of the **Estate of Denease Conley**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

197. **Cherrie L. Allen** is a surviving Sibling of Denease Conley, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

198. **Irma Joyce Fletcher** is a surviving Sibling of Denease Conley, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

199. **Myra Byrd** is the Personal Representative of the **Estate of Earl Ray**, a Sibling of Denease Conley, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

200. **Barbara Haynes-Jenkins** is a surviving Sibling of Denease Conley, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

201. **Herman Ray** is the Personal Representative of the **Estate of James Ray**, a Sibling of Denease Conley, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

202. **Odetta Heywood** is the Personal Representative of the **Estate of Stanley Ray**, a surviving Sibling of Denease Conley, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

203. **Aaron Adler** is a surviving Sibling of Lee Alan Adler, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

204. **Alice Doerge Adler** is the surviving Spouse of Lee Alan Adler, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

205. **Alice Doerge Adler** is the Personal Representative of the **Estate of Lee Alan Adler**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

206. **Isabell Dansiger Adler** is a surviving Parent of Lee Alan Adler, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

207. **Jay Adler** is a surviving Sibling of Lee Alan Adler, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

208. **Lauren Sarah Adler Martinelli** is a surviving Child of Lee Alan Adler, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

209. **Anita DeBlase** is a surviving Parent of **James V. DeBlase**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-

Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

210. **Anthony DeBlase** is a surviving Sibling of **James V. DeBlase**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

211. **Richard DeBlase** is a surviving Sibling of **James V. DeBlase**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

212. **Marianna Garfi** is a surviving Parent of **Francesco Garfi**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

213. **Salvatore Garfi** is a surviving Parent of **Francesco Garfi**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

214. **Vito Garfi** is a surviving Sibling of **Francesco Garfi**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

215. **Vito Garfi** is the Personal Representative of the **Estate of Francesco Garfi, Deceased**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

216. **Hank Grazioso** is a surviving Parent of John Grazioso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

217. **Theresa Cooke** is a surviving Sibling of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

218. **Michelle Hargis** is a surviving Sibling of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

219. **Christine Homer** is a surviving Sibling of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

220. **Christine Homer** is the Personal Representative of the **Estate of Thomas Freimark**, a Sibling of LeRoy W. Homer, one of the Decedents murdered as a result of the

terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

221. **Ilse Homer** is a surviving Parent of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

222. **Monique Homer** is a surviving Sibling of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

223. **Marilyn Johnson** is a surviving Sibling of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

224. **Cheryl Homer Wilson** is a surviving Sibling of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

225. **Germaine Wilson** is a surviving Sibling of LeRoy W. Homer, Jr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

226. **Andrew Brian Jordan, Jr.**, is a surviving Child of Andrew Brian Jordan, Sr., one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

227. **David Lebor** is a surviving Sibling of Leon Lebor, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

228. **Rina Kaufman a/k/a/ Joy Kaufman** is the Personal Representative of the **Estate of Philip Lebor**, a Parent of Leon Lebor, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

229. **Danielle McGuire** is the surviving Spouse of Patrick McGuire, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

230. **Danielle McGuire** is the Personal Representative of the **Estate of Patrick McGuire**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

231. **Mara McGuire** is a surviving Child of Patrick McGuire, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

232. **Ryan McGuire** is a surviving Child of Patrick McGuire, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

233. **Sean McGuire** is a surviving Child of Patrick McGuire, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

234. **Shea McGuire** is a surviving Child of Patrick McGuire, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

235. **AnneMarie Medaglia** is a surviving Parent of Rocco Medaglia, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried

out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

236. **Diana Medaglia** is a surviving Child of Rocco Medaglia, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

237. **Kathleen Medaglia-Dellapenna** is a surviving Sibling of Rocco Medaglia, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

238. **MaryEllen Medaglia** is a surviving Sibling of Rocco Medaglia, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

239. **Michael Medaglia** is a surviving Sibling of Rocco Medaglia, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

240. **Elizabeth Medaglia-Cordes** is a surviving Child of Rocco Medaglia, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

241. **Elizabeth Medaglia-Cordes** is the Personal Representative of the **Estate of Rocco Medaglia**, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

242. **Joanne Mistrulli** is the Personal Representative of the **Estate of Frank Mistrulli**, a surviving Sibling of Joseph D. Mistrulli, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

243. **Paula Nacke Jacobs** is a surviving Sibling of Louis J. Nacke, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

244. **Dale Allen Nacke** is a surviving Sibling of Louis J. Nacke, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

245. **Dale Allen Nacke** is the Personal Representative of the **Estate of Louis P. Nacke**, who was a Parent of Louis J. Nacke, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

246. **Dale Allen Nacke** is the Personal Representative of the **Estate of Philomena Millace Nacke**, who was a Parent of Louis J. Nacke, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban provided material support and assistance in furtherance of the attacks.

247. **Joseph Nicholas Nacke** is a surviving Child of Louis J. Nacke, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

248. **Kenneth Nacke** is a surviving Sibling of Louis J. Nacke, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

249. **Louis Paul Nacke, II** is a surviving Child of Louis J. Nacke, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

250. **Thomas Papasso** is a surviving Sibling of Salvatore T. Papasso, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

251. **Patricia Mason** is a surviving Sibling of Sandra Wright-Cartledge, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried

out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

252. **James Casazza** is a surviving Sibling of John F. Casazza, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

253. **Debra Zeplin** is the Personal Representative of the **Estate of Marc Scott Zeplin**, Deceased, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

254. **Debra Zeplin** is the surviving Spouse of Marc Scott Zeplin, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

255. **Ethan Zeplin** is a surviving Child of Marc Scott Zeplin, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

256. **Ryan Zeplin** is a surviving Child of Marc Scott Zeplin, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

257. **Daniel R. Maher** is a surviving Child of Daniel L. Maher, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

258. **Joseph F. Maher** is a surviving Child of Daniel L. Maher, one of the Decedents murdered as a result of the terrorist attacks of September 11, 2001, that were carried out by al-Qaeda and Osama bin Laden, Deceased, and to which the Taliban and Muhammad Omar provided material support and assistance in furtherance of the attacks.

259. All of the above Plaintiffs are citizens of the United States.

DEFENDANTS

260. Defendant **Al Qaeda, a/k/a Al Qaeda Islamic Army** (hereinafter “Al Qaeda”) is an unincorporated association and terrorist organization dedicated to the destruction of the United States and its citizens. At relevant times, the Al Qaeda organization was headquartered in Afghanistan with the and involved a cluster of military-ideological camps dedicated to their goal of establishing a universal Islamic state through the use of violence. Al Qaeda maintains terrorist cells throughout the world.

261. Defendant Al Qaeda was founded, headed and directed by **Defendant Sheikh Usamah bin-Muhammad bin-laden, Deceased a/k/a Osama Bin Laden, Deceased**. Bin Laden was reported by the U.S. Government to have been killed during a raid by United States military forces on his compound in Abbottabad, Pakistan on May 2, 2011. In addition to Bin Laden, certain individuals were responsible for the direction and management of Al Qaeda’s terrorist activities, including the terrorist attacks of September 11, 2001. Those individuals acted both individually and as agents, instrumentalities, officials, representatives, officers and employees of Al Qaeda in

exporting terror to the United States and other countries.

262. Defendant Al Qaeda uses violence, bombings, murder, mayhem and other terrorist tactics in order to pursue its unlawful objectives. At relevant times, Al Qaeda was supported, controlled, funded, protected, aided and abetted by all Defendants named herein, particularly its leader, bin Laden, the Taliban, Muhammad Omar, and their instrumentalities, agents, officials and employees.

263. Bin Laden and al-Qaeda violently opposed the United States for several reasons. First, the United States was regarded as an “infidel nation” because it was not governed in a manner consistent with the group's extremist interpretation of Islam. Second, the United States was viewed as providing essential support for other “infidel” governments and institutions. Third, al-Qaeda opposed the involvement of the United States armed forces in the Gulf War in 1991 and in Operation Restore Hope in Somalia in 1992 and 1993. In particular, al-Qaeda opposed the continued presence of American military forces in Saudi Arabia (and elsewhere on the Arabian peninsula) following the Gulf War. Fourth, al-Qaeda opposed the United States Government because of the arrest, conviction, and imprisonment of persons belonging to al-Qaeda or its affiliated terrorist groups or those with whom it worked. For these and other reasons, bin Laden declared *jihad*, or holy war, against the United States, which he carried out through al-Qaeda and its affiliated organizations.

264. At relevant times, al-Qaeda functioned both on its own and through terrorist organizations that operated under its umbrella, including Egyptian Islamic Jihad, which was led by Ayman al-Zawahiri, the Islamic Group (also known as “*el Gamaa el Islamia*” or simply “*Gamaa’i*”), and a number of *jihadi* groups in other countries, including the Sudan, Egypt, Saudi Arabia, Yemen, Somalia, Eritrea, Djibouti, Afghanistan, Pakistan, Bosnia, Croatia, Albania,

Algeria, Tunisia, Lebanon, the Philippines, Tajikistan, Azerbaijan, the Kashmiri region of India, and the Chechnyan region of Russia. Al-Qaeda also maintained cells and personnel in a number of countries to facilitate its activities, including Kenya, Tanzania, the United Kingdom, Germany, Canada, Malaysia, and the United States.

265. Al-Qaeda had a command and control structure which included a “*majlis al shura*” (or consultation council) which discussed and approved major undertakings, including terrorist operations. Al-Qaeda also had a “military committee” which considered and approved “military” matters. These matters were generally terrorist activities, not conventional military activities. One of the principal goals of al-Qaeda was to drive the United States armed forces out of Saudi Arabia (and elsewhere on the Arabian peninsula) and Somalia by violence. These goals eventually evolved into a declaration of *jihad* (holy war) against America and all Americans. Members of al-Qaeda issued *fatwahs* (rulings on Islamic law) indicating that such attacks on Americans were both proper and necessary.

266. Like Iran, al-Qaeda and bin Laden used terrorism as an instrument of policy, as a tool to be used to further political objectives. Al-Qaeda has, over the years, directly carried out murders, bombings, and other terrorist acts against its enemies. It has also provided direct and indirect support to other international terrorist groups and received support in return, often in the form of money, training, sanctuary, documentation, intelligence, weapons, and other types of assistance.

267. At all relevant times, as of 1996, Defendant **the Taliban** was a political regime operating as the Islamic Emirate of Afghanistan. The Taliban was an unincorporated association described by the U.S. Department of Treasury, Office of Foreign Asset Control (“OFAC”) in its Overview of Sanctions Regulations as: “(1) the political/military entity headquartered in

Kandahar, Afghanistan that, as of October 21, 1999, exercised de facto control over Kandahar, Farah, Helmund, Nimruz, Herat, Badghis, Ghawr, Oruzghon, Zabol, Paktiha, Ghanzi, Nangarhar, Lowgar, Vardan, Faryab, Jowlan, Balkh, Paktiha, and Kabul; (2) its agencies and instrumentalities; (3) associated blocked persons, as determined by the U.S. Department of the Treasury and published in the Federal Register, and listed on OFAC's list of 'Specially Designated Nationals and Blocked Persons' (the SDN List)."

268. The Taliban, from 1996 until the U.S. invasion in 2001 following the terrorist attacks, governed the vast majority of the population of Afghanistan. The term "Taliban" means "pupils" or "students" and is used for those seminarians or students of religious schools who are politically and militarily active in militant Islamic groups. The Taliban movement started among the Afghan refugees trained in the religious schools of Pakistan financed by private Saudi funding. Motivated by religious fervor and supplied by Pakistani army intelligence, these seminarians/students were organized by the Taliban into a fighting force. The Afghan Civil War enabled the Taliban's gradual takeover of Afghanistan. The Taliban regime imposed their ultra-purest vision of Islam with strict religious doctrine. Accordingly, the Taliban regime was deeply hostile to women, Shiites, and minorities. The Taliban eliminated all aspects of modern culture and human rights, and it suppressed any form of dissent.

269. Defendant **Muhammad Omar** ("Omar") founded the Taliban in 1996. Since then, Omar was the leading member of the Taliban's six-member ruling council and was reportedly responsible for all financial matters. Initially, Muhammad Omar was an obscure guerilla commander during the Afghan Civil War. However, by 1994, Omar had a following of thousands motivated by religious militancy and proceeded by 1996 to oust the Soviets from Afghanistan and he prevailed over Afghan tribal warlords competing for power. Known as "Commander of the

Faithful,” Omar, individually and through the Taliban organization which he controlled, Omar supplied material support to Al Qaeda and Bin Laden in furtherance of their terrorist plans to murder Americans, plans in which Omar and the Taliban were complicit. The activities of Omar as described herein were outside the scope of immunity, if any, provided by the Foreign Sovereign Immunities Act and related statutes.

270. In conducting his terrorist activities, Omar received financial, logistical, and other material support from foreign states.

271. Defendants the Taliban and Omar willfully engaged in acts of terrorism, murder, mayhem, and/or the provision of material support and/or resources for said acts, within the borders of Afghanistan, the United States, and other countries, and across state and national boundaries as described more fully herein. The end result of those activities was the murder of all Decedents on September 11, 2001.

272. Following the U.S. invasion of Afghanistan in 2001, the Taliban’s activities were disrupted and a new Afghan government was installed in allyship with the United States.

273. During the withdrawal of U.S. troops from Afghanistan in August 2021, the Taliban once again took control of Afghanistan in only a single weekend.

FACTUAL BACKGROUND

Osama bin Laden and al-Qaeda

274. In or about 1989, Osama bin Laden, Muhammad Atef, and others founded an international terrorist group that became known as al-Qaeda. Osama bin Laden was the “*emir*” (prince) of al-Qaeda and was its leader at all relevant times. Members of al-Qaeda pledged an oath of allegiance (called a “*bayat*”) to Osama bin Laden and al-Qaeda.

275. From 1989 until about 1991, al-Qaeda was headquartered in the Islamic Emirate

of Afghanistan and Peshawar, Pakistan.

276. Osama Bin Laden, a Saudi citizen, was expelled from the Kingdom of Saudi Arabia in 1991. In or about 1991, Hassan al-Turabi, leader of Sudan's ruling National Islamic Front party, allowed Osama Bin Laden entrance into Sudan. During this time period, Sudan abandoned visa requirements for Arabs and actively encouraged Islamic militants to live within its borders. By the end of 1991, there were between 1,000 and 2,000 members of al-Qaeda in Sudan.

277. Al-Qaeda was headquartered in the Sudan from 1991 until approximately 1996. During that time, Osama bin Laden was able to establish a powerful military and political presence in Sudan, using a variety of business ventures to finance his activities.

278. In 1996, Osama bin Laden and other members of al-Qaeda relocated to the Islamic Emirate of Afghanistan. From 1996 until 2001, bin Laden and al-Qaeda sponsored, managed, and/or financially supported training camps in Afghanistan. These camps were used to instruct members and associates of al-Qaeda and its affiliated terrorist groups in the use of firearms, explosives, chemical weapons, and other weapons of mass destruction. In addition to providing training in the use of various weapons, these camps were used to conduct operational planning against United States targets around the world and experiments in the use of chemical and biological weapons. These camps were also used to train al-Qaeda members in security and counterintelligence methods, such as the use of codes and passwords, and to teach members and associates of al-Qaeda about traveling to perform operations. For example, al-Qaeda instructed its members and associates to dress in Western attire and to use other methods to avoid detection by security officials. The group also taught its members and associates to monitor media reports of its operations to determine the effectiveness of their terrorist activities.

279. During the time from about 1996 until 2001 when al-Qaeda operated from its headquarters in Afghanistan, bin Laden and al-Qaeda forged close relations with the ruling regime, the Taliban, and Taliban leader Muhammad Omar. Bin Laden openly informed other al-Qaeda members and associates outside Afghanistan of their support of, and alliance with, the Taliban and Omar.

280. Al-Qaeda has often used operatives such as the hijackers to actively engage in terrorist activities against the United States and its citizens. In conducting those terrorist activities, al-Qaeda received financial, logistical, and other material support from the Taliban as well as from Iran other foreign states.

281. At times relevant hereto, Osama Bin Laden and al-Qaeda committed and threatened to commit acts of violence and terror against the United States and its citizens. The Taliban, operating as the Islamic Emirate of Afghanistan, and others aided these terrorist schemes by, among other things, allowing territory under their control to be used as a safe haven and base of operations for Osama Bin Laden and the al-Qaeda organization. In 1999, the United States government recognized that these activities constituted an unusual and extraordinary threat to the nation's security and foreign policy. President Clinton issued Executive Order No. 13129, declaring a national emergency to deal with that threat. EO 13129, issued under the authority of International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1706) ("IEEPA"), the National Emergencies Act (50 U.S.C. § 1601 *et seq.*) and §301 of Title 3, United States Code, imposed an asset freeze against the Taliban. That asset freeze was subsequently continued by President George W. Bush through a Presidential Order issued on July 2, 2001.

282. Statements of U.S. officials and government reports demonstrate how the expansive support provided by the Taliban and Muhammad Omar enabled Osama bin Laden to

build and sustain the al-Qaeda organization, and acquire the resources and assets necessary to carry out the September 11th attacks.

283. In this regard, the 9/11 Commission expressly found that the “9/11 attack was a complex international operation, the product of years of planning.” *See* 9/11 Commission Final Report at p. 365.

284. The 9/11 Commission’s Final Report further states that plans for the attacks were carefully vetted through al-Qaeda’s most senior leadership over a period of nearly six years, while those leaders were safely ensconced in training camps and safe houses provided by the Taliban and funded by al-Qaeda’s financial supporters; that the individuals selected to participate in the attacks were chosen from an enormous pool of potential candidates, all of whom were recruited, trained, and indoctrinated with funds provided by the organization’s supporters; and that details of the plans were revised up until the last minute, through a sophisticated global communication network capable of evading the surveillance and intelligence operations of the United States and its allies, the development and existence of which was also dependent on the financial sponsorship of al-Qaeda’s supporters.

285. The cost of maintaining this essential infrastructure in the years immediately leading up to the September 11th attacks was massive. For example, al-Qaeda’s budget included \$20 million in payments to the Taliban alone, in exchange for the safe haven the Taliban provided to al-Qaeda, from which al-Qaeda planned, coordinated, and directed the September 11th attacks.

286. Based on these and other findings of its investigation concerning the relationship between al-Qaeda’s global infrastructure and the organization’s operational capability to plan, coordinate and mount the September 11th attacks, the 9/11 Commission reached the following

conclusions regarding the basic organizational and support requirements for staging a sophisticated terrorist attack:

- A complex international terrorist operation aimed at launching a catastrophic attack cannot be mounted by just anyone in any place.
- Such operations appear to require time, space, and ability to perform competent planning and staff work;
- a command structure able to make necessary decisions and possessing the authority and contacts to assemble needed people, money, and materials;
- opportunity and space to recruit, train, and select operatives with the needed skills and dedication, providing the time and structure required to socialize them into the terrorist cause, judge their trustworthiness, and hone their skills;
- a logistics network able to securely manage the travel of operatives, move money, and transport resources (like explosives) where they need to go;
- reliable communications between coordinators and operatives; and
- opportunity to test the workability of the plan.

See 9/11 Commission Final Report at pp. 365-66.

287. Defendants the Taliban and Muhammad Omar provided bin Laden and al-Qaeda with much of the basic organizational and support requirements identified by the 9/11 Commission. In addition to providing a safe haven where al-Qaeda had the time, space, and ability to conduct the training and staff work needed to plan, coordinate, and direct the September 11th attacks, the Taliban and Muhammad Omar were directly involved in al-Qaeda's tactical operations. For example, documents recovered from the personal files of Muhammad Omar following the September 11th attacks indicate that on November 21, 1999, Omar instructed the Afghan Ambassador in Pakistan to distribute "\$2 million from Saudi aids" to Jon Juma Namangani, a close associate of Osama bin Laden who was then serving as al-Qaeda's commander

in Uzbekistan.

288. Thus from about 1989, Defendants herein, and in conjunction with others, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed to kill and maim persons within the United States, and to create a substantial risk of serious bodily injury to other persons by destroying and damaging structures and other real and personal property within the United States.

289. In furtherance of this conspiracy, Defendants utilized facilities of interstate and foreign commerce, often through illegal means. The intended victims of this conspiracy were United States citizens, the United States Government, and the property of the United States and its citizens. The conspiracy resulted in the deaths of the Decedents on September 11, 2001.

In furtherance of the conspiracy, and to effect its objects, Defendants committed the following acts:

- a. The Taliban/Islamic Emirate of Afghanistan, Muhammad Omar, Osama Bin Laden and others, provided training camps and guesthouses in territory controlled by the Taliban in Afghanistan, including camps known as Khalden, Derunta, Khost, Siddiq, and Jihad Wal, for the use of al-Qaeda and its affiliated groups.
- b. The Taliban/Islamic Emirate of Afghanistan, Muhammad Omar, Osama Bin Laden and others, provided military and intelligence training to al-Qaeda and its affiliated groups at camps and other locations within Afghanistan.
- c. The Taliban/Islamic Emirate of Afghanistan, Muhammad Omar, Osama Bin Laden and others, engaged in financial and business transactions on behalf of al-Qaeda, including, but not limited to: purchasing land for training camps;

purchasing warehouses for storage of items, including weapons and explosives; purchasing communications and electronics equipment; transferring funds between corporate accounts; and transporting currency and weapons to members of al-Qaeda and its associated terrorist organizations in various locations inside and outside Afghanistan.

290. On September 11, 2001, five al-Qaeda operatives – Mohammed Atta, Abdul Aziz Alomari, Satam Al Suqami, Waleed M. Alshehri and Wail Alshehri – hijacked American Airlines Flight 11, a Boeing 767, which had departed Boston at approximately 7:59 a.m. They flew Flight 11 into the North Tower of the World Trade Center in Manhattan at approximately 8:45 a.m., causing the collapse of the tower and the deaths of Decedents.

291. On September 11, 2001, five al-Qaeda operatives – Hamza Alghamdi, Fayez Banihammad, Mohand Alshehri, Ahmed Alghamdi, and Marwan al-Shehhi – hijacked United Airlines Flight 175, a Boeing 767, which had departed from Boston at approximately 8:14 a.m. They thereafter flew Flight 175 into the South Tower of the World Trade Center in Manhattan at approximately 9:03 a.m., causing the collapse of the tower and the deaths of Decedents.

292. On September 11, 2001, five al-Qaeda operatives – Khalid Almihdhar, Majed Moqed, Nawaf Alhazmi, Salem Alhazmi, and Hani Hanjour – hijacked American Airlines Flight 77, a Boeing 757, which had departed from Virginia bound for Los Angeles, at approximately 8:10 a.m. They flew Flight 77 into the Pentagon in Virginia at approximately 9:37 a.m., causing the deaths of Decedents.

293. On September 11, 2001, four al-Qaeda operatives – Saeed Alghamdi, Ahmed Alnami, Ahmed Al Haznawi, and Ziad Jarrah – hijacked United Airlines Flight 93, a Boeing 757, which had departed Newark, New Jersey bound for San Francisco at approximately 8:42 a.m.

After resistance by the passengers, Flight 93 crashed in Shanksville, Somerset County, Pennsylvania at approximately 10:06 a.m., killing Decedents.

294. The hijackers used box cutters and knives to commit air piracy and murder on behalf of, and with the aid and assistance of, Osama Bin Laden, the Taliban, Muhammad Omar, and al-Qaeda.

295. The September 11, 2001 attacks were the culmination of a conspiracy among all Defendants, and others, to plan, finance, support, and execute terrorist murder.

296. As a direct and proximate result of the intentional, willful, reckless, and careless actions of the Defendants, all Plaintiffs have suffered severe and permanent personal injuries, damages, and losses, including the following:

- (a) Decedents' fear of death prior to the crash into and collapse of the World Trade Center Towers, the crash into the Pentagon, and the crash of United Airlines Flight 93;
- (b) the severe mental anguish suffered by Decedents and all Plaintiffs;
- (c) the severe pain and suffering suffered by Decedents and all Plaintiffs;
- (d) the inability of all Decedents to perform the usual household and personal activities that they normally would have performed through the remainder of their natural life expectancies;
- (e) loss of Decedents' earnings and future earning potential;
- (f) loss of Decedents' life and life's pleasures;
- (g) loss of consortium and/or companionship;
- (h) costs relating to managing the estates of all Decedents; and
- (i) death of the Decedents by way of murder as a result of the Defendants' conduct and

that of their co-conspirators.

297. The deaths, personal injuries and losses experienced by the Plaintiffs were caused by the intentional outrageous acts, recklessness, and carelessness of all Defendants, acting individually and in concert, and of their agents, servants, employees, agencies and instrumentalities, acting within and during the course and scope of their employment, authority, or apparent authority.

298. Defendants Osama Bin Laden, al-Qaeda, and the Taliban, have been purposely singled out by the President of the United States as entities that commit, threaten to commit, or support terrorism, specifically including those acts which resulted in the September 11, 2001, murders. These Defendants conspired among themselves to plan and commit the 9/11 attacks that caused the death of Decedents and the related injuries to all Plaintiffs. Accordingly, all Defendants are subject to liability to the Plaintiffs.

COUNT ONE
PLAINTIFFS v. ALL DEFENDANTS
VIOLATION OF THE ANTI-TERRORISM ACT
18 U.S.C. §2333

299. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

300. The Defendants herein engaged in acts of international terrorism, defined at 18 U.S.C. as §2331 as activities that involve violent acts dangerous to human life that are in violation of the criminal law of the United States and appear to be intended to intimidate or coerce a civilian population; to influence policy of a government by intimidation or coercion; or to affect the conduct of a government by mass destruction and assassination.

301. Defendants' activities transcended international boundaries in terms of the means by which they were accomplished and the persons they intended to intimidate or coerce.

302. Pursuant to 18 U.S.C. §2333(a), a national of the United States injured in his or her person, property or business by reason of an act of international terrorism, or his or her estate, survivors, or heirs, may sue therefore in any appropriate district court of the United States and shall recover threefold the damages he or she sustains and the costs of suit, including attorneys' fees.

303. Pursuant to 18 U.S.C. §2333(d)(2), in an action under subsection (a) for an injury arising from an act of international terrorism committed, planned, or authorized by an organization that had been designated as a foreign terrorist organization under section 219 of the Immigration and Nationality Act (8 U.S.C. §1189), as of the date on which such act of international terrorism was committed, planned, or authorized, liability may be asserted as to any person who aids and abets, by knowingly providing substantial assistance, or who conspires with the person who committed such an act of international terrorism.

304. At the time of the September 11, 2001 attacks, al-Qaeda was designated as a foreign terrorist organization under section 219 of the Immigration and Nationality Act.

305. During the decade preceding the September 11th attacks, al-Qaeda repeatedly made clear, through both declarations and actions, its intent to use funds and resources provided to it to conduct large scale terrorist attacks in order to kill innocent civilians, destroy property on a mass scale, and cause catastrophic economic harm.

306. The relentless campaign by al-Qaeda and its material supporters to carry out terrorist attacks against the United States and its citizens, which culminated in the September 11th attacks, involved continuous acts of violence and acts dangerous to human life, that violate the criminal laws of the United States, including the prohibitions set forth in 18 U.S.C. § 2332. *See* 18 U.S.C. § 2332b(a) (prohibiting conduct transcending national boundaries: killing or attempting

to kill persons within the United States; causing serious bodily injury or attempting to cause serious bodily injury to persons within the United States; destroying or damaging any structure, conveyance, or other real or personal property within the United States; or attempting or conspiring to destroy any or damage any structure conveyance, or other real or personal property within the United States).

307. As set forth above, Defendants knowingly provided material support, resources, and substantial assistance to, and conspired with, al-Qaeda over many years, with an intent to further al-Qaeda's campaign to carry out terrorist attacks against the United States and its citizens on September 11, 2001.

308. The material support Defendants provided to al-Qaeda, as described above, enabled al Qaeda to acquire the global strike capabilities employed on September 11, 2001, and was essential to al-Qaeda's ability to carry out the attacks.

309. The September 11th attacks were a direct and foreseeable result of Defendants' provision of material support to and sponsorship of al-Qaeda. Plaintiffs suffered personal injuries by reason of the September 11th attacks and Defendants' tortious acts in support of al-Qaeda.

310. Through the tortious acts in support of al-Qaeda described above, Defendants aided and abetted, and conspired with, al-Qaeda to carry out acts of international terrorism against the United States and its citizens on September 11, 2001, in violation of United States criminal and civil laws set forth at 18 U.S.C. §§ 2332(a), 2332(b), 2332(c), and 2333.

311. Defendants also agreed to combine and conspire with al-Qaeda and other persons to act unlawfully, in the manners set forth in this complaint, and committed overt acts in furtherance of the conspiracy. At all relevant times, Defendants knew of the conspiracy and of the

roles of the al-Qaeda elements they were supporting in furtherance of the conspiracy.

312. Pursuant to 18 U.S.C. § 2333, Defendants are jointly and severally liable for Plaintiffs' injuries and Plaintiffs are entitled to recover threefold the amount of damages they have sustained.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants jointly, severally, and/or individually, for compensatory and punitive damages in excess of One Billion Dollars (\$1,000,000,000) as follows:

- (a) Economic damages to each 9/11 Decedent Estate in accordance with the methodology the Court found to be appropriate in *Havlish, et al. v. bin Laden, et al.*, civil action no. 03-9848;
- (b) Non-economic damages of \$2,000,000 per 9/11 Decedent Estate as established by the *Havlish* damages paradigm;
- (c) Solatium damages for individual surviving family members as established by the *Havlish* solatium damages paradigm;
- (d) Treble damages;
- (e) Punitive damages; and
- (f) Pre- and post-judgment interest, attorney's fees, costs of this action and such other and further relief as the Court may deem appropriate under the circumstances.

COUNT TWO

PLAINTIFFS v. MUHAMMAD OMAR and OSAMA BIN LADEN, DECEASED
TORTURE VICTIM PROTECTION ACT of 1991 ("TVPA")
28 U.S.C. § 1350 note.

313. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

314. The purpose of the TVPA is "[t]o carry out obligations of the United States under the United Nations Charter and other international agreements pertaining to the protection of human rights by establishing a civil action for recovery of damages from an individual who

engages in torture and extrajudicial killing.” 28 U.S.C. § 1350 note.

315. The TVPA establishes a federal cause of action against “any individual, under actual or apparent authority, or color of law, of any foreign nation, [who] subjects an individual to extrajudicial killing.” TVPA § 2(a)(2). See also H.R. 102-367.

316. For purposes of the TVPA, an “extrajudicial killing” is defined as “a deliberated killing not authorized by a previous judgment pronounced by a regularly constituted court recognizing all the judicial guarantees that are recognized as indispensable as civilized peoples.” TVPA § 3(a).

317. The TVPA provides that anyone who subjects an individual to an extrajudicial killing “shall, in a civil action, be liable for damages to the individual’s legal representative, or to any person who may be a claimant in an action for wrongful death.” TVPA § 2(a)(2).

318. Osama bin Laden and the Taliban, through its leader Muhammad Omar, provided material support and resources to al-Qaeda in furtherance of the murderous acts of the al-Qaeda hijackers. Those Defendants subjected the Decedents to extrajudicial killing.

319. The injuries and damages suffered by Plaintiffs as a result of the extrajudicial killing of Decedents, and the consequences resulting therefrom, were proximately caused by the intentional and reckless acts of all Defendants as described herein.

320. As a result of the Defendants’ murderous conduct, the 9/11 Decedents and all Plaintiffs suffered damages as fully set forth in the paragraphs above which are incorporated herein by reference.

WHEREFORE, Plaintiffs demand judgment in their favor against Muhammad Omar and Osama bin Laden, Deceased, jointly, severally, and/or individually, for compensatory and punitive damages in excess of One Billion Dollars (\$1,000,000,000) as follows:

- (g) Economic damages to each 9/11 Decedent Estate in accordance with the methodology the Court found to be appropriate in *Havlish, et al. v. bin Laden, et al.*, civil action no. 03-9848;
- (h) Non-economic damages of \$2,000,000 per 9/11 Decedent Estate as established by the *Havlish* damages paradigm;
- (i) Solatium damages for individual surviving family members as established by the *Havlish* solatium damages paradigm;
- (j) Punitive damages; and
- (k) Pre- and post-judgment interest, attorney's fees, costs of this action and such other and further relief as the Court may deem appropriate under the circumstances.

COUNT THREE
PLAINTIFFS v. ALL DEFENDANTS
WRONGFUL DEATH

321. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

322. Plaintiffs herein bring this action for the wrongful deaths that Defendants proximately caused by engaging in, materially supporting or sponsoring, financing, aiding and abetting, scheming and/or otherwise conspiring to commit or cause to occur acts of murder and wrongful death, specifically, the mass murder committed by the terrorist attacks acts of September 11, 2001.

323. The acts of Defendants in providing material aid and support to al-Qaeda in carrying out the terrorist attacks were the proximate cause of the wrongful deaths of the 9/11 Decedents.

324. The actions of Defendants, acting in concert to carry out their unlawful objectives, were malicious, outrageous and in willful, wanton, and reckless disregard of the rights of the 9/11 Decedents and all Plaintiffs. Defendants, acting individually and jointly, intended to carry out

actions that would end the lives of the Decedents.

325. As a result of their intentional, malicious, outrageous, willful and wanton conduct, Plaintiffs suffered injuries and incurred damages as described herein.

Defendants are jointly and severally liable to all Plaintiffs for compensatory and punitive damages.

WHEREFORE, Plaintiffs demand judgment in their favor against Defendants, jointly, severally, and/or individually, for compensatory and punitive damages in excess of One Billion Dollars (\$1,000,000,000) as follows:

- (a) Economic damages to each 9/11 Decedent Estate in accordance with the methodology the Court found to be appropriate in *Havlish, et al. v. bin Laden, et al.*, civil action no. 03-9848;
- (b) Non-economic damages of \$2,000,000 per 9/11 Decedent Estate as established by the *Havlish* damages paradigm;
- (c) Solatium damages for individual surviving family members as established by the *Havlish* solatium damages paradigm;
- (d) Punitive damages; and
- (e) Pre- and post-judgment interest, attorney's fees, costs of this action and such other and further relief as the Court may deem appropriate under the circumstances.

COUNT FOUR
PLAINTIFFS v. ALL DEFENDANTS
SURVIVAL

326. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

327. Plaintiffs bring this action for damages suffered by the Decedents and caused by the Defendants' conduct. As a result of the intentional and negligent acts of the Defendants as described above, the Decedents were placed in apprehension of harmful and offensive bodily contact (assault), suffered offensive and harmful bodily contact (battery), suffered extreme fear,

anxiety, emotional and psychological distress (intentional/negligent infliction of emotional distress), and were mentally and physically harmed, trapped, and falsely imprisoned (false imprisonment) prior to their deaths.

328. As a result of the Defendants' murderous conduct, the Decedents suffered damages including pain and suffering, trauma, emotional distress, loss of life and life's pleasures, loss of earnings and earning capacity, loss of accretion to their estates and other items of damages as fully set forth in the paragraphs above which are incorporated herein by reference.

WHEREFORE, Plaintiffs demand judgment in their favor against all Defendants, jointly, severally, and/or individually, in an amount in excess of One Billion Dollars (\$1,000,000,000) for compensatory and punitive damages, plus interest, costs, and such other monetary and equitable relief as this Honorable Court deems appropriate to prevent the Defendants from ever again committing the terrorist acts of September 11, 2001 or similar acts.

COUNT FIVE
PLAINTIFFS v. ALL DEFENDANTS
NEGLIGENT AND/OR INTENTIONAL
INFLICTION OF EMOTIONAL DISTRESS

329. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

330. All Defendants knew that the September 11, 2001 intentional hijacking and suicide flights would injure innocent United States citizens at their place of work, leaving family members to grieve for their losses.

331. The actions of the Defendants in using the September 11, 2001 intentional hijacking and suicide flights to murder the Decedents were done with a willful disregard for the rights and lives of the Plaintiffs.

332. As a direct and proximate result of Defendants' conduct, Plaintiffs have suffered

and will forever in the future suffer severe and permanent psychiatric disorders, emotional distress and anxiety, permanent psychological distress and permanent mental impairment causing expenses for medical care and counseling.

333. The conduct of the Defendants was undertaken in an intentional manner to kill American citizens. Their efforts culminated in the murder of the Decedents and caused the contemporaneous and permanent emotional suffering of the families and heirs of the Decedents.

334. The Defendants, by engaging in this unlawful conduct, negligently and/or intentionally inflicted emotional distress upon the Plaintiffs.

335. As a result of their intentional, malicious, outrageous, willful, wanton and negligent conduct, Plaintiffs suffered injuries and incurred damages as described herein and Defendants are jointly and severally liable to all Plaintiffs for compensatory and punitive damages.

WHEREFORE, Plaintiffs demand judgment in their favor against Defendants, jointly, severally, and/or individually, for compensatory and punitive damages in excess of One Billion Dollars (\$1,000,000,000) as follows:

- (a) Economic damages to each 9/11 Decedent Estate in accordance with the methodology the Court found to be appropriate in *Havlish, et al. v. bin Laden, et al.*, civil action no. 03-9848;
- (b) Non-economic damages of \$2,000,000 per 9/11 Decedent Estate as established by the *Havlish* damages paradigm;
- (c) Solatium damages for individual surviving family members as established by the *Havlish* solatium damages paradigm;
- (d) Punitive damages; and
- (e) Pre- and post-judgment interest, attorney's fees, costs of this action and such other and further relief as the Court may deem appropriate under the circumstances.

COUNT SIX
PLAINTIFFS v. ALL DEFENDANTS

CONSPIRACY

336. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

337. As set forth more fully above, all Defendants, known and unknown, unlawfully, willfully and knowingly combined, conspired, confederated and agreed, tacitly and/or expressly, to kill the Decedents and other persons within the United States.

338. As set forth above, all Defendants conspired and agreed to provide material support and resources to al-Qaeda in furtherance of Defendants' overall goal to kill American citizens and other persons residing in the United States.

339. As set forth above, all Defendants engaged in concerted efforts and activities designed to attack the United States and inflict harm on U.S. citizens and property.

340. The Defendants' conspiracy resulted in the September 11 terrorist attacks that killed the Decedents.

341. As a result of the Defendants' conspiracy, Plaintiffs have suffered damages as fully set forth in the paragraphs above which are incorporated herein by reference.

WHEREFORE, Plaintiffs demand judgment in their favor against Defendants, jointly, severally, and/or individually, for compensatory and punitive damages in excess of One Billion Dollars (\$1,000,000,000) as follows:

- (a) Economic damages to each 9/11 Decedent Estate in accordance with the methodology the Court found to be appropriate in *Havlish, et al. v. bin Laden, et al.*, civil action no. 03-9848;
- (b) Non-economic damages of \$2,000,000 per 9/11 Decedent Estate as established by the *Havlish* damages paradigm;
- (c) Solatium damages for individual surviving family members as established by the *Havlish* solatium damages paradigm;

- (d) Punitive damages; and
- (e) Pre- and post-judgment interest, attorney's fees, costs of this action and such other and further relief as the Court may deem appropriate under the circumstances.

COUNT SEVEN
PLAINTIFFS v. ALL DEFENDANTS
AIDING AND ABETTING

342. Plaintiffs incorporate herein by reference the averments contained in the preceding paragraphs as though fully set forth at length.

343. As set forth above, Defendants knowingly and substantially assisted in the sponsorship of al-Qaeda, international terrorism and the September 11, 2001 terrorist attacks.

344. At the time of such aiding and abetting, Defendants knew or should have known that their role was part of an overall and ongoing illegal, criminal and/or tortious activity.

345. As set forth above, Defendants aided and abetted in concerted efforts, transactions, acts and activities designed to cause the attacks of September 11, 2001, on the United States, its citizens, foreign citizens, its liberties and freedoms.

346. The Defendants' aiding and abetting of international terrorism through material sponsorship of al-Qaeda was a proximate cause of the September 11, 2001 terrorist attacks that killed Decedents and inflicted injury on all Plaintiffs.

347. As a direct and proximate result of Defendants' aiding and abetting activities, Plaintiffs have suffered damages as set forth herein.

WHEREFORE, Plaintiffs demand judgment in their favor against Defendants, jointly, severally, and/or individually, for compensatory and punitive damages in excess of One Billion Dollars (\$1,000,000,000) as follows:

- (a) Economic damages to each 9/11 Decedent Estate in accordance with the methodology the Court found to be appropriate in *Havlish, et al. v. bin Laden, et*

al., civil action no. 03-9848;

- (b) Non-economic damages of \$2,000,000 per 9/11 Decedent Estate as established by the *Havlish* damages paradigm;
- (c) Solatium damages for individual surviving family members as established by the *Havlish* solatium damages paradigm;
- (d) Punitive damages; and
- (e) Pre- and post-judgment interest, attorney's fees, costs of this action and such other and further relief as the Court may deem appropriate under the circumstances.

Respectfully Submitted,

Date: August 23, 2022

/s/ Timothy B. Fleming

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